SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC

ATTORNEYS AT LAW

Ronald M. Sullivan
Jesse T. Mountjoy
Frank Stainback
James M. Miller
Michael A. Fiorella
William R. Dexter
Allen W. Holbrook
R. Michael Sullivan

P. Marcum Willis Bryan R. Reynolds

> Tyson A. Kamuf Mark W. Starnes

Julia B. Hawes

July 26, 2005

Via Federal Express

Ms. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard, P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEIVEL

JIL 2 7 2005

PUBLIC SERVICE

SOMMISSION

Re:

In the Matter of: The Application of East Kentucky Power Cooperative, Inc. for a Certificate of Public Convenience and Necessity to Construct a 161 KV Transmission Line in Barren, Warren, Butler, and Ohio Counties, Kentucky, Case No. 2005-00207

Dear Ms. O'Donnell:

Enclosed are an original and ten copies of the motion of Big Rivers Electric Corporation to intervene in the above-referenced matter. Please feel free to contact me with any questions.

Sincerely yours,

James M. Miller

JMM/ej

cc: Roger R. Cowden

Michael H. Core

my M. meen

David A. Spainhoward

Telephone (270) 926-4000 Telecopier (270) 683-6694

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

JUL 2 7 2005 PUBLIC SERVICE COMMISSION

In the Matter of:

THE APPLICATION OF EAST KENTUCKY)	
POWER COOPERATIVE, INC. FOR)	
A CERTIFICATE OF PUBLIC CONVENIENCE)	
AND NECESSITY TO CONSTRUCT A 161 KV)	CASE NO. 2005-00207
TRANSMISSION LINE IN BARREN, WARREN,)	
BUTLER, AND OHIO COUNTIES, KENTUCKY)	

MOTION OF BIG RIVERS ELECTRIC CORPORATION FOR FULL INTERVENTION

Big Rivers Electric Corporation ("Big Rivers"), moves that it be granted full intervention in this proceeding, including all rights of a party under the statutes and regulations of the Public Service Commission ("Commission"). In support of its motion, Big Rivers states, through counsel, that Segment 4 of the proposed East Kentucky Power Cooperative, Inc. ("EKP") project terminates at Big Rivers' Wilson generating station where it interconnects with Big Rivers' high voltage transmission system. Big Rivers accordingly has a special interest in this proceeding which is not otherwise adequately or fully represented by a party. Big Rivers' participation in this proceeding will develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

If the Commission grants this motion to intervene, copies of pleadings, correspondence, and all other documents submitted by parties should be served upon the following persons, as indicated:

Tyson Kamuf
SULLIVAN, MOUNTJOY, STAINBACK
& MILLER, P.S.C.
100 St. Ann Street, P. O. Box 727
Owensboro, Kentucky 42302-0727
Phone No. (270) 926-4000
Facsimile (270) 683-6694
jmiller@smsmlaw.com

James M. Miller

David A. Spainhoward VP, Contract Administration and Regulatory Affairs 201 Third Street, P.O. Box 24 Henderson, Kentucky 42420-0024 Phone No. (270) 827-2561 Facsimile (270) 827-2558 dspainhoward@bigrivers.com

Wherefore, Big Rivers respectfully prays that the Commission enter an order granting it full intervention as set out above, and for all other relief to which it may appear entitled.

This the 26th day of July, 2005.

James M. Miller Tyson Kamuf

SULLIVAN, MOUNTJOY, STAINBACK

& MILLER, P.S.C.

100 St. Ann Street, P. O. Box 727 Owensboro, Kentucky 42302-0727 Phone No. (270) 926-4000 Facsimile (270) 683-6694

COUNSEL FOR BIG RIVERS
ELECTRIC CORPORATION